

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DEBORAH CHIN, Individually and on behalf of all
others similarly situated,

Plaintiff,

V.

SONUS NETWORKS, INC., HASSAN AHMED and
STEPHEN NILL,

Defendants.

Civil Case 1:04-cv-10294 DPW

MICHELLE TREBITSCH, on Behalf of Herself and All
Others Similarly Situated,

Plaintiff,

V.

SONUS NETWORKS, INC., HASSAN M. AHMED
and STEPHEN J. NILL,

Defendants.

Civil Case 1:04 cv 10307 DPW

Additional Captions to Follow

**MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF
AND FOR APPROVAL OF SELECTION OF LEAD AND LIAISON COUNSEL**

INFORMATION DYNAMICS, LLC, on behalf of Itself
and all Others Similarly Situated,

Plaintiff,

V.

SONUS NETWORKS, INC., PAUL R. JONES,
EDWARD N. HARRIS, J. MICHAEL O'HARA,
HASSAN AHMED and STEPHEN NILL,

Defendants.

PETER KALTMAN, on Behalf of Himself and All
Others Similarly Situated,

Plaintiff,

V.

SONUS NETWORKS, INC., RUBIN GRUBER,
HASSAN M. AHMED and STEPHEN J. NILL,

Defendants.

SAMANTHA DEN, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

V.

SONUS NETWORKS, INC., HASSAN M. AHMED
and STEPHEN J. NILL,

Defendants.

RICHARD CURTIS, Individually and on behalf of all
others Similarly Situated,

Plaintiff,

V.

SONUS NETWORKS, INC., HASSAN AHMED and
STEPHEN NILL,

Defendants.

RONALD KASSOVER, on Behalf of the RONALD
KASSOVER IRA and All Others Similarly Situated,

Plaintiff,

V.

SONUS NETWORKS, INC., HASSAN M. AHMED
and STEPHEN J. NILL,

Defendants.

STEVE L. BAKER, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

V.

SONUS NET WORKS, INC., HASSAN AHMED and
STEPHEN NILL,

Defendants.

MICHAEL KAFFEE, Individually and On Behalf of All Others Similarly Situated,)	
)	Civil Case 1:04-cv-10345 DPW
)	
Plaintiff,)	
)	
v.)	
)	
SONUS NETWORKS, INC., HASSAN AHMED and STEPHEN NILL,)	
)	
)	
Defendants.)	

HAIMING HU, Individually and on Behalf of All Others Similarly Situated,)	
)	Civil Case 1:04 cv 10346 DPW
)	
Plaintiff,)	
)	
v.)	
)	
SONUS NETWORKS, INC., HASSAN AHMED and STEPHEN NILL,)	
)	
)	
Defendants.)	

DANIEL WILLIAMS, Individually and On Behalf of All Others Similarly Situated,)	
)	Civil Case 1:04 cv 10359 DPW
)	
Plaintiff,)	
)	
v.)	
)	
HASSAN M. AHMED, STEPHEN J. NILL EDWARD T. ANDERSON, PAUL J. FEERRI, PAUL J. SEVERINO and SONUS NETWORKS, INC.,)	
)	
)	
Defendants.)	

CHARLES STARBUCK, Individually and on behalf of all others Similarly Situated,)	
)	Civil Case 1:04-cv-10362 DPW
)	
Plaintiff,)	
)	
v.)	
)	
SONUS NETWORKS, INC., HASSAN AHMED and STEPHEN NILL,)	
)	
)	
Defendants.)	

SAMUEL HO, Individually and On Behalf of All Others Similarly Situated,)	
)	Civil Case 1:04 cv 10363 DPW
)	
Plaintiff,)	
)	
v.)	
)	
SONUS NETWORKS, INC., HASSAN AHMED and STEPHEN. NILL,)	
)	
)	
Defendants.)	

JEFFREY C. RODRIGUES, Individually and On Behalf of All Others Similarly Situated,)	
)	Civil Case 1:04 cv 10364 DPW
)	
Plaintiff,)	
)	
v.)	
)	
SONUS NET WORKS, INC., HASSAN M. AHMED and STEPHEN J. NILL,)	
)	
)	
Defendants.)	

ROBERT CONTE and MARK RESPLER, on Behalf of)
Themselves and All Others Similarly Situated,) Civil Case 1:04-cv-10382 DPW

Plaintiff,)
)

v.)
)

SONUS NETWORKS, INC., HASSAN AHMED and)
STEPHEN NILL,)

Defendants.)

WHEATON ELECTRICAL SERVICES)
RETIREMENT 401K PROFIT SHARING PLAN, On) Civil Case 1:04 cv 10383 DPW
Behalf of Itself and All Others Similarly Situated,)

Plaintiff,)
)

v.)
)

SONUS NETWORKS, INC., HASSAN AHMED and)
STEPHEN J. NILL,)

Defendants.)

MICHELLE BURK, Derivatively on behalf of Sonus)
Networks, Inc., A Delaware Corporation,) Civil Case 1:04 cv 10384 DPW

Plaintiff,)
)

v.)
)

HASSAN AHMED, EDWARD T. ANDERSON,)
PAUL J. FERRI, RUBIN GRUBER, PAUL)
SEVERINO, JOHN MICHAEL O'HARA, EDWARD)
N. HARRIS, STEPHEN NILL, PAUL R. JONES and)
SONUS NETWORKS, INC., A *DELAWARE*)
CORPORATION,)

Defendants.)

BRIAN CLARK, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

V.

SONUS NETWORKS, INC., PAUL R. JONES,
EDWARD N. HARRIS, J. MICHAEL O'HARA,
HASSAN M. AHMED and STEPHEN J. NILL,

Defendants.

MICHAEL PISNOY, Derivatively on Behalf of Sonus
Networks, Inc.,

Plaintiff,

V.

HASSAN M. AHMED, RUBIN GRUBER, EDWARD
T. ANDERSON, PAUL J. FERRI, ALBERT A.
NOTINI, PAUL J. SEVERINO, PAUL R. JONES,
EDWARD N. HARRIS, J. MICHAEL O'HARA and
STEPHEN J. NILL,

Defendants.

SHEILA BROWNELL, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

V.

SONUS NET WORKS, INC., HASSAN AHMED and
STEPHEN NILL,

Defendants.

SAVERIO PUGLIESE, on Behalf of Himself and All
Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M. AHMED
and STEPHEN J. NILL,

Defendants.

)
) Civil Case 1:04-cv-10612 DPW
)

DAVID V. NOCITO, on Behalf of Himself and All
Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M. AHMED
and STEPHEN J. NILL,

Defendants.

)
) Civil Case 1:04 cv 10623 DPW
)

Class members Marc Wexler, Scott Baugh, Sajid Patel, Carlos Rios and Thomas Munson (the "Wexler Group") by their counsel, hereby move this Court for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing the Wexler Group as Lead Plaintiff; (iii) approving the Wexler Group's selection of the law firm of Cauley Geller Bowman & Rudman, LLP to serve as Lead Counsel and the law firm of Shapiro, Haber & Urmey to serve as Liaison Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, the Wexler Group submits herewith a Memorandum of Law and Declaration of Theodore M. Hess-Mahan dated April 12, 2004.

Dated: April 12, 2004

Respectfully submitted,

SHAPIRO, HABER & URMY LLP

/s/Theodore M. Hess-Mahan

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Theodore M. Hess-Mahan BBO #557109
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Telephone: (617) 439-3939

Proposed Liaison Counsel

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Proposed Lead Counsel